

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

ALI EL-KHALIL, D.P.M.,

Case No. 18-cv-12759-MAG-APP

Plaintiff,

Judge Mark A. Goldsmith

v.

Magistrate Judge Anthony P. Patti

ANTHONY TEDESCHI, MOHAMMED
KHALIL, NSIMA USEN, MAHMUD
ZAMLUT, LEONARD ELLISON, and THE
DETROIT MEDICAL CENTER, a Domestic
Not for Profit Corporation, jointly and severally,

Defendants.

**BRIEF IN SUPPORT OF PLAINTIFF’S EMERGENCY MOTION
FOR A TEMPORARY RESTRAINING ORDER AND PRELIMINARY
INJUNCTION ENJOINING DEFENDANT, THE DETROIT MEDICAL
CENTER, FROM MAKING ANY REPORT REGARDING THE STATUS
OF PLAINTIFFS’ MEDICAL STAFF PRIVILEGES WITH THE
NATIONAL PRACTITIONER DATA BANK (“NPDB”), STATE OF
MICHIGAN, AND OTHER REGULATORY AGENCIES AND
AUTHORITIES**

INDEX OF EXHIBITS

Exhibit	Date	Description
A	4/24/2020	Email exchange between Roger Meyers and Ben Gonek
B	4/27/2020	Affidavit of Plaintiff
C	10/10/2017- 11/7/2017	Police reports regarding 10//10/2017 parking lot assault
D	11/30/2017	Petition by Plaintiff and Personal Protective Order against Mohammed Khalil
E	12/14/2017	Email from Deborah Freeman to Plaintiff confirming renewal of privileges
F	1/8/2018	Letter from Ben Gonek to Aaron Maddox, M.D.
G	3/20/2018	Letter from DMC to Ben Gonek denying renewal of Plaintiff's DMC staff privileges
H	5/22/2014	DMC Medical Staff Bylaws
I	3/4/2019	TO BE FILED UNDER SEAL – DMC Hearing Panel Report and Recommendation
J	3/22/2019	Letter from DMC to Plaintiff reversing prior decision not to renew Plaintiff's staff privileges
K	5/3/2019	Letter from DMC to Plaintiff announcing Joint Conference Committee to reverse MEC and deny renewal of Plaintiff's staff privileges
L	5/21/2019	Plaintiff's appeal of Joint Conference Committee decision
M	1/10/2018- 7/2/2018	Email correspondence between Plaintiff's counsel and DMC counsel, Frances Fenelon
N	N/A	Proposed Temporary Restraining Order
O	N/A	NPDB Guidebook